

**RESPONSE TO COMMENTS FROM
RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
ON THE DRAFT HUMAN HEALTH SITE RISK ASSESSMENT – SITE 16
JANUARY 2002**

Comment 1: Page 2-2, Section 2.1.3, Exposure Pathways and Receptors of Concern, Paragraph 3 – This paragraph notes that the residential scenario is included in this analysis as a conservative measure. Please revise this to state that the residential scenario is included because the land associated with the marina is subject to RIDEM residential criteria.

Response— As stated in the text, residential use of Site 16 is not expected in the future. Therefore, consideration of residential exposure is to be conservative. This discussion will remain in the text.

Comment 2: Page 2-3, Section 2.1.3, Exposure Pathways and Receptors of Concern, Paragraph 2 – This section notes that surface soil is evaluated from 0 to 2 ft. below ground surface for the recreation scenario. As noted above, the recreation scenario is to be evaluated under residential conditions under RIDEM Remediation Regulations, amended 1996. Residential soil is to be evaluated from the surface to the top of the water table, not just the top two feet. Please revise the analysis accordingly.

Response— The HHRA evaluation, including the definitions of the media of concern, follows the EA March 2000 Site 16 RI Final Work Plan. Total soil (surface and subsurface soil, combined) is evaluated for the residential scenario. As a recreational receptor is only expected to contact surface soils, this receptor is evaluated for surface soil. As the recreational receptor is only likely to contact surface soils and this is in accordance with the work plan, the risk assessment will not be revised.

Comment 3: Page 2-3, Section 2.1.4, Risk Based Screening, Paragraph 1, Sentence 2 – This sentence states that any analyte in any medium for which the maximum measured concentration exceeded the risk-based screening concentration is retained as a COPC. This implies that if the concentration is below the risk-based screening concentration then the compound is no longer considered. Under the RIDEM Remediation Regulations, amended 1996, compounds cannot be excluded from the risk analysis until it is shown that there is no risk from that compound.

Response— The HHRA evaluation, including the screening analysis, follows the EA March 2000 Site 16 Final RI Work Plan. The screening analysis follows both EPA Region I (Risk Update 5) and federal EPA (RAGS A, 1989) risk assessment guidance. As explained in the text and in these standard guidance documents, the screening values used in the screening analysis are highly conservative; a comparison of the maximum detected compound in a medium to the medium-specific screening value demonstrates no risk for that compound. The screening analysis will not be revised, but text will be added to the screening analysis discussion to clarify this.

Comment 4: This risk analysis concludes in general that there are no unacceptable risks associated with this site from soil and sediment. Please be advised that this risk analysis does not conform to Method III RIDEM Remediation Regulations for determining risk at a site for the reasons noted above as well as others. Based on the data contained in the Remedial Investigation, for this site, various PAH compounds and metals are in exceedance of RIDEM Residential Exposure Criteria (Method I) for both soil and sediment samples. Therefore, RIDEM believes there are risks associated with these media. RIDEM does concur, however, that there are unacceptable risks associated with the groundwater.

Response— The risk assessment evaluated PAHs and metals in soil per EPA federal and regional guidance and in accordance with the March 2000 work plan. Several PAHs and metals exceeded their screening values for soil and were then evaluated for potential risk in the risk assessment. The results of the risk assessment indicated that there are no unacceptable risks for soil at Site 16. The application at this point of RIDEM's non-site-specific values as the sole indicator of risk is not applicable in that the site-specific risk assessment has demonstrated no unacceptable risk.

Sediment was not included in the HHRA (in accordance with the March 2000 work plan).